

**From:** [Emanuel Kataev](#)  
**To:** [Vincent Bauer](#)  
**Cc:** [Spencer Shapiro](#); [Diane Murphy](#)  
**Subject:** RE: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)  
**Date:** Wednesday, April 3, 2024 11:51:26 PM  
**Attachments:** [2024-04-03 Ds Initial Disclosures.pdf](#)

---

With thanks to you for your patience, please see below responses.

Withheld?

- 1) yes
- 2) no
- 3) yes
- 4) yes
- 5) yes
- 6) no
- 7) yes
- 8) no
- 9) yes
- 10) no

No. 5 – we have checks for payments for rent, which we are looking to compile and produce

Nos. 7-10 - standing on objections

Also attached are our Rule 26 disclosures.

Best,

**Emanuel Kataev, Esq.**  
**Sage Legal LLC**  
**Emanuel Kataev, Esq., P.C.**  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421 (office)  
(917) 807-7819 (cellular)  
(718) 489-4155 (facsimile)  
[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)

This message and its attachments may contain confidential information that is legally privileged. If you are not the intended recipient, you are hereby notified that any printing, copying, forwarding, or saving of this message is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the message and any attachment from your system.

**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Sent:** Thursday, March 28, 2024 10:29 AM  
**To:** Vincent Bauer <[vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)>  
**Cc:** Spencer Shapiro <[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)>; Diane Murphy <[dmurphy@rfriedmanlaw.com](mailto:dmurphy@rfriedmanlaw.com)>  
**Subject:** Re: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)

Yes. Slammed with opp due tomorrow but I have responses to share with you. Will send tonight.

Emanuel Kataev, Esq.  
Sage Legal LLC

Sent from my iPhone

---

**From:** Vincent Bauer <[vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)>  
**Sent:** Thursday, March 28, 2024 10:00:24 AM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Spencer Shapiro <[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)>; Diane Murphy <[dmurphy@rfriedmanlaw.com](mailto:dmurphy@rfriedmanlaw.com)>  
**Subject:** RE: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)

**Caution: This email originates from outside of the sagelegalllc.com. Do not click links or open attachments unless you recognize the sender and know the content is safe**

Emanuel, are you going to advise me as to the status of your client's discovery positions and responses? I will prepare a draft status letter icw tomorrow's deadline, and need to advise the court in that regard.

---

**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Sent:** Saturday, March 23, 2024 11:26 AM  
**To:** Vincent Bauer <[vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)>  
**Cc:** Spencer Shapiro <[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)>; Diane Murphy <[dmurphy@rfriedmanlaw.com](mailto:dmurphy@rfriedmanlaw.com)>  
**Subject:** Re: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)

Up to you. I would think we should submit a status update asap apologizing for not getting to it by the deadline and just outlining the current status: we exchanged responses to discovery demands, P met and conferred with both Ds concerning purported deficiencies, and by the way, let's move deps deadline to 4/30. I'm no Mr. Cleo, but I imagine there will be another status report order deadline following the submission of this one.

Emanuel Kataev, Esq.  
Sage Legal LLC  
Sent from my iPhone

---

**From:** Vincent Bauer <[vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)>  
**Sent:** Saturday, March 23, 2024 11:21:34 AM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Cc:** Spencer Shapiro <[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)>; Diane Murphy <[dmurphy@rfriedmanlaw.com](mailto:dmurphy@rfriedmanlaw.com)>  
**Subject:** Re: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)

**Caution: This email originates from outside of the sagelegalllc.com. Do not click links or open attachments unless you recognize the sender and know the content is safe**

We need to schedule depositions and determine discovery issues for court determination first, no?

Sent from my iPhone

On Mar 23, 2024, at 2:35 AM, Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)> wrote:

This flew by the wayside. Who wants to take lead on drafting a joint status report? We can tie it in with the letter motion for an extension of time to complete depositions.

Best,

**Emanuel Kataev, Esq.**  
**Sage Legal LLC**  
**Emanuel Kataev, Esq., P.C.**  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421 (office)  
(917) 807-7819 (cellular)  
(718) 489-4155 (facsimile)  
[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)

This message and its attachments may contain confidential information that is legally privileged. If you are not the intended recipient, you are hereby notified that any printing, copying, forwarding, or saving of this message is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the message and any attachment from your system.

---

**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>  
**Sent:** Friday, March 8, 2024 3:59 PM  
**To:** Spencer Shapiro <[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)>; [vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)  
**Cc:** Diane Murphy <[dmurphy@rfriedmanlaw.com](mailto:dmurphy@rfriedmanlaw.com)>  
**Subject:** Re: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)

I'm out of office but can review and propose revisions.

Emanuel Kataev, Esq.  
Sage Legal LLC  
Sent from my iPhone

---

**From:** Spencer Shapiro <[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)>  
**Sent:** Friday, March 8, 2024 3:32:38 PM  
**To:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>; [vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)  
<[vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)>  
**Cc:** Diane Murphy <[dmurphy@rfriedmanlaw.com](mailto:dmurphy@rfriedmanlaw.com)>  
**Subject:** RE: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)

**Caution: This email originates from outside of the sagelegalllc.com. Do not click links or open attachments unless you recognize the sender and know the content is safe**

All,

Just a reminder we have that status report due today.

<image001.png>

---

**Spencer D. Shapiro**

Associate

[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)

[www.rfriedmanlawgroup.com](http://www.rfriedmanlawgroup.com)

T 516-355-9602

400 Garden City Plaza, Suite 500

F 516-348-1708

Garden City, NY 11530

---

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties under federal, state or local tax law or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

PLEASE TAKE NOTICE: The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you receive this transmission in error, please contact the sender immediately and delete the material from any computer.

**From:** Emanuel Kataev <[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)>

**Sent:** Tuesday, March 5, 2024 8:07 PM

**To:** [vbauer@vbauerlaw.com](mailto:vbauer@vbauerlaw.com)

**Cc:** Spencer Shapiro <[sshapiro@rfriedmanlaw.com](mailto:sshapiro@rfriedmanlaw.com)>

**Subject:** Re: Sanchez v. EZ Parking Corporation, et al.; Case No.: 1:23-cv-4052 (AMD) (VMS) (EDNY)

Counselors:

Please find attached Defendant EK Premier Services LLC's responses & objections to Plaintiff's discovery demands.

Regards,

**Emanuel Kataev, Esq.**  
**Sage Legal LLC**  
**Emanuel Kataev, Esq., P.C.**  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421 (office)  
(917) 807-7819 (cellular)  
(718) 489-4155 (facsimile)  
[emanuel@sagelegal.nyc](mailto:emanuel@sagelegal.nyc)

This message and its attachments may contain confidential information that is legally privileged. If you are not the intended recipient, you are hereby notified that any printing, copying, forwarding, or saving of this message is strictly prohibited. If you have received this email in error, please notify the sender immediately and delete the message and any attachment from your system.